Remarks

I. Administrative Overview

Claims 1-66 and 68 were previously presented. Claims 1, 23, 45 and 68 are hereby amended. Upon entry of the present amendments, Claims 1-66 and 68 are pending of which Claims 1, 23, 45 and 68 are independent claims. No new matter has been introduced.

Applicants respectfully request reconsideration and withdrawal of all rejections levied against the pending claims.

II. Rejections under 35 U.S.C. § 103

Claims 1-6, 10-19, 21, 23-28, 32-42, 44-52, 56-64, 66 and 68

Claims 1-6, 10-19, 21, 23-28, 32-42, 44-52, 56-64, 66 and 68 are rejected under 35 U.S.C. § 103(a) as unpatentable over Brezak in view of U.S. Patent Number 5,557,678 to Ganesan ("Ganesan") and in further view of Brezak2. Applicants respectfully submit that Claims 1-6, 10-19, 21, 23-28, 32-42, 44-52, 56-64, 66 and 68 as previously presented are patentable over any combination of Brezak, Ganesan and Brezak2.

Obviousness is shown only when two or more references either alone or in combination, teach or suggest each and every element of the claimed invention. Applicants respectfully submit that any combination of Brezak, Ganesan and Brezak2 fails to teach or suggest each and every element of the claimed invention.

Brezak fails to teach or suggest a ticket authority that: generates either a ticket comprising a first ticket and a second ticket, or a first ticket and a second ticket; validates the first ticket; enables the second ticket when the first ticket has been validated; and validates the second ticket as required by each independent claim. Instead, Brezak describes a system for generating and validating tickets, where a client gains access to server A by requesting a ticket from a trusted third party, receiving the service ticket associated with the client and server A generated by the trusted third party, and sending the service ticket to server A to initiate a communication session. *See* Brezak, paragraph 43. Server A can then request further service tickets on the client's behalf. *See* Brezak, paragraphs 45-48. While it is suggested that either an authentication service or server A can validate the initial service ticket sent by the client to

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establish a communication session with server A, there is no suggestion or teaching that either the authentication service or server A validates the second ticket obtained by server A on behalf of the client. See Brezak, paragraphs 53-55. Brezak is entirely silent as to what validates the "second ticket" obtained by server A on behalf of the client. For this reason, Brezak does not teach or suggest a ticket authority that: generates either a ticket comprising a first ticket and a second ticket, or a first ticket and a second ticket; validates the first ticket; enables the second ticket when the first ticket has been validated; and validates the second ticket. Brezak does not teach or suggest each and every element of independent Claims 1, 23, 45 and 68.

Brezak2, like Brezak, also fails to teach or suggest a ticket authority that: generates either a ticket comprising a first ticket and a second ticket, or a first ticket and a second ticket; validates the first ticket; enables the second ticket when the first ticket has been validated; and validates the second ticket as required by each independent claim. Brezak2 describes a system for providing access, where a client gains access to a server by requesting a service ticket from a key distribution center. See Brezak2, paragraphs 59-62. When the key distribution center receives a request from a client, the key distribution center first looks at an authenticator associated with the client to validate the client's identity, then the key distribution center issues a service ticket. To establish communication with the server, the client sends the server the service ticket generated by the key distribution center. See id. Brezak2 is entirely silent as to what validates the service ticket sent from the client to the server. Thus, Brezak2 does not teach or suggest a ticket authority that: generates either a ticket comprising a first ticket and a second ticket, or a first ticket and a second ticket; validates the first ticket; enables the second ticket when the first ticket has been validated; and validates the second ticket. Brezak2 therefore does not teach or suggest each and every element of independent Claims 1, 23, 45 and 68.

Ganesan, like Brezak and Brezak2, fails to teach or suggest a ticket authority that: generates either a ticket comprising a first ticket and a second ticket, or a first ticket and a second ticket; validates the first ticket; enables the second ticket when the first ticket has been validated; and validates the second ticket as required by each independent claim. As discussed in the Response filed on July 25, 2008, Ganesan describes the pre-generation of session keys, but fails to teach or suggest the enablement or disablement of session keys based on the validation of other session keys. Therefore, Ganesan does not teach or suggest each and every element of independent Claims 1, 23, 45 and 68.

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For the above-mentioned reasons, neither Brezak, Brezak2 nor Ganesan teach or suggest each and every element of independent Claims 1, 23, 45 and 68. Therefore, Claims 1, 23, 45 and 68 are patentable over any combination of Brezak, Brezak2 and Ganesan. Claims 2-6, 10-19, 21, 24-28, 32-42, 44, 46-52, 56-64 and 66 are also patentable over any combination of Brezak, Brezak2 and Ganesan because Claims 2-6, 10-19, 21, 24-28, 32-42, 44, 46-52, 56-64 and 66 are dependent on Claims 1, 23, 45 and 68.

Claims 7-9, 29-31 and 53-55

Claims 7-9, 29-31 and 53-55 are rejected under 35 U.S.C. § 103(a) as unpatentable over Brezak in view of Brezak2, in further view of Ganesan and in further view of U.S. Patent Publication No. 2003/0233554 to Litai et al. ("Litai"). Claims 7-9, 29-31 and 53-55 depend on and incorporate all of the patentable subject matter of independent Claims 1, 23, 45 and 68. Applicants respectfully traverse this rejection and submit that any combination of Brezak, Ganesan, Brezak2 and Litai fails to teach or suggest each and every element of the claimed invention.

The patentability of Claims 1, 23, 45 and 68 over Brezak, Ganesan and Brezak2 is argued above. These arguments are reiterated here and set forth in full. Like Brezak, Ganesan and Brezak2, Litai also fails to teach or suggest a ticket authority that: generates either a ticket comprising a first ticket and a second ticket, or a first ticket and a second ticket; validates the first ticket; enables the second ticket when the first ticket has been validated; and validates the second ticket as required by each independent claim. Therefore Litai fails to detract from the patentability of dependent Claims 7-9, 29-31 and 53-55. Accordingly, Claims 7-9, 29-31 and 53-55 are patentable over any combination of Brezak, Ganesan, Brezak2 and Litai.

For the above-mentioned reasons, Applicants respectfully request the Examiner to withdraw all rejections made under 35 U.S.C. § 103.

III. Conclusion

Applicants contend that each of the Examiner's rejections has been adequately addressed and that all of the pending claims are in a condition for allowance. Accordingly, Applicants

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respectfully request reconsideration and withdrawal of all grounds of rejection, and allowance of the pending claims.

Should the Examiner feel that a telephone conference with Applicants' agent would expedite prosecution of this application; the Examiner is urged to contact the Applicants' agent at the telephone number identified below.

Respectfully submitted, CHOATE, HALL & STEWART LLP

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